

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 19**

INTERNATIONAL LONGSHORE AND
WAREHOUSE UNION, LOCAL 19,

Cases 19-CD-111765
 19-CD-111802

Charged Party,

and

NATIONAL CONSTRUCTION ALLIANCE
II,

Charging Party,

and

PACIFIC NORTHWEST REGIONAL
COUNCIL OF CARPENTERS,

Charging Party,

and

SEATTLE TUNNEL PARTNERS, A JOINT
VENTURE,

Interested Party,

and

TOTAL TERMINALS INTERNATIONAL
LLC,

Interested Party.

MOTION FOR EXTENSION OF BRIEFING DEADLINE

International Longshore and Warehouse Union, Local 19 hereby requests that the current deadline of September 25, 2013 for post-hearing briefs be extended an additional five (5) business days to October 4, 2013.

ILWU LOCAL 19's MOTION FOR EXTENSION OF BRIEFING
DEADLINE - 1
CASES 19-CD-111765; 19-CD-111802

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The hearing in this matter was four days in length and generated what is estimated to be over 500 pages of transcripts, all of which will need careful review in order to write a meaningful post-hearing brief. Counsel has not yet received the transcripts for the last two days of hearing and does not expect to receive those transcripts until September 23, 2013, two days before the current briefing deadline. This case involves many complicated legal issues which require thorough attention, both on the applicable law and on the law as applied to the facts. Additional time is required.

Additionally, scheduling demands necessitate a postponement of the briefing deadline. Counsel for ILWU Local 19 has been in back-to-back hearings for the last two weeks, including but not limited to a different Section 10(k) hearing, in Case 19-CD-106874. In addition to reviewing the lengthy transcripts and writing the post-hearing brief in the instant case, counsel for ILWU Local 19 must attend to many pressing and time-sensitive tasks on which work was deferred because of the instant hearing, including but not limited to providing testimony and position statements by the deadlines set by the NLRB Regional Offices in Case 20-CB-111546 and Case 19-CA-113463, and deadlines related to other litigation and arbitral matters unrelated to any NLRB proceeding, including an arbitration hearing set for September 24, 2013.

Based on the foregoing, ILWU Local 19 requests an extension to October 4, 2013 for the deadline to submit post-hearing briefs.

RESPECTFULLY SUBMITTED this 19th day of September, 2013.

s/Dmitri Iglitzin
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ILWU LOCAL 19's MOTION FOR EXTENSION OF BRIEFING
DEADLINE - 2
CASES 19-CD-111765; 19-CD-111802

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ILWU LOCAL 19's MOTION FOR EXTENSION OF BRIEFING
DEADLINE - 3
CASES 19-CD-111765; 19-CD-111802

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of September, 2013, I caused the foregoing Motion for Extension of Briefing Deadline to be filed electronically with the National Labor Relations Board, to the Division of Judges and Region 19, via the *nrlb.gov* website and true and correct copies of the same to be delivered via electronic and same day US First Class mail to:

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And via facsimile to:

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